

In The United States District Court
For The District Of Delaware

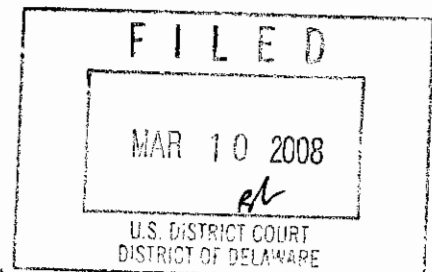
William Joseph Webb Jr.,
Plaintiff,

v.

First Corrections Medical,
Et. Al.,
Defendants,

Civ. Act. No. : 07-31-GMS

Jury Trial Requested



Plaintiff's Reply to Defendants', (All), Response to Plaintiff's
Letter/Motion for Preliminary Injunctive Relief.

Comes now, Plaintiff showing good cause for an issuance
of an Injunction against Defendant "CMS", shows the following:

1. Defendant "CMS" is a defendant in this litigation
who is still being deliberate indifferent to "serious medical
needs", where Plaintiff is most likely going to have to amend
his Complaint with all of the new instances.

2. The December 12, 2007 incident was motivated by racial discrimination which ultimately Plaintiff filed two more grievances on January 22, 2008.

3. As of this date, Plaintiff has a series of boils on his chest, buttocks, and both legs which has recently gotten worse.

4. On February 19, 2008, put in a sick call slip and immediately saw a Nurse Practitioner on the 20th who said I have a staph infection but don't know exactly if it is M.R.S.A., she did a culture on the 21st of February, 2008.

5. On February 22, 2008 received two packets of Bactrim, with no medicine.

6. On January 15, 2008, Movant wrote Mr. Taylor's attorney because he was on antibiotics after a January 9, 2008 appt. with the same Nurse Practitioner.

7. The attached Appendix supports Plaintiff's claims in his letter.

8. Since 2005, F.C.M.S. has been aware of, along with "CMS", Plaintiff's Hep. C, but yet not one treatment plan.

has been arrived at nor put into action, where as other inmates that were undergoing the same direction as Plaintiff to receive the proper treatments have already received their liver biopsies, mental health evaluations, and receiving the proper treatments according to procedure.

9. January 22, 2008, Plaintiff filed 2 more grievances; the first one was concerning the December 12, and December 19, 2007 incidents where it was racial discrimination that prompted Plaintiff to be denied medical attention; the second one was about why the antibiotics were stopped 4 days early and requesting a follow-up Dr.'s appointment with a specialist.

10. As "Taylor's" attorney thinks Plaintiff is only trying to obtain monetary gain, this is quite contrary, where if "Cms" would do their job properly, I wouldn't have had to contact administrators.

11. If the Court would notice, it is February and Plaintiff filed grievances in November 2007 which are unresolved,

the Grievance process is inadequate, along with you have people here playing Dr. who aren't Drs. as even the former Judge Martin noted in the News Journal article in the Appendix to this reply.

12. "cms" still hasn't sent the Production of Documents, only medical records, and "Taylor's" attorney has excluded the January 22, 2008 grievances.

13. "CMS's" affidavit has misrepresented facts to try to pass any wrongdoing to "FCM" by manipulating the date of April 19, 2006 to April 19, 2005, this is more reason to grant Preliminary Injunction.

Relief Requested: That the Court grant Plaintiff injunctive relief to receive proper medical attention and any other appropriate relief the Court may deem necessary.

March 5
Dated: ~~February~~, 2008

Respectfully Submitted,
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